

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

ANA ROSA OLIVELLA RIVERA

Plaintiff

Vs.

POPULAR LEASING AND RENTAL INC.;

Banco Popular De PR and Their Unknown

Insurance Companies Named Herein

"Popular Leasing Insurance, Co." and

Puerto Rico American Insurance, Co. (PRAICO)

Defendants

* CIVIL NUMBER: 98-2267

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* CREDIT COLLECTION

* DAMAGES

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* TRIAL BY JURY REQUESTED

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OBJECTION TO FILING DISPOSITIVE MOTIONS

TO THE HONORABLE COURT:

COMES NOW plaintiff through the undersigned attorney and respectfully alleges and pray:

1. Defendants have requested to this Honorable Court it intention to file a summary judgment as expressed in their motion dated January 13, 2005.
2. Plaintiff opposes the filing of said motions for the same is not only tardy but in prior occasions Defendants have filed dispositive motions.
3. Moreover, the present case has been scheduled for pretrial on November 1, 2004, but due to calendar reasons as previously explained by this

Honorable Court. Therefore, filing of said dispositive motions is tardy for all procedural proceedings.

Therefore its is respectfully requested that said request be denied.

RESPECTFULLY REQUEST.

I CERTIFY that on this same date I have filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: David López, Esq., Dagmar A. Adorno Toro, Esq., Pérez Pietri & Díaz Ríos.

In Caguas, Puerto Rico, this January 21, 2005.

s/Rafael A. Oliveras López de Victoria
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